assessment statements.

In our original comments in Docket 80-286, we supported state administration of federal

funds. However, given the requirements of the 1996 Act for separate and distinct universal

service support mechanisms at the state and federal levels and the "large-scale information

processing and data base capabilities" that will be necessary to manage the fund, we believe that

the FCC should designate a third party administrator for federal fund administration. We

believe that NECA has done an excellent job of administering the fund in the past and we would

support their continued oversight and administration of the federal fund in the future.

III. Conclusion

The PaPUC appreciates the opportunity to provide comment in this important Docket and

asks the Commission to adopt universal service rules consistent with the comments expressed

herein. The PaPUC looks forward to participating in future stages of this proceeding, including

the filing of reply comments.

Respectfully submitted,

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Commission

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Dated: April 11, 1996

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing INITIAL COMMENTS OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION TO THE NOTICE OF PROPOSED RULEMAKING AND ORDER ESTABLISHING JOINT BOARD have been served this 12th day of April, 1996, upon all parties listed on the attached service list by first class mail, postage-prepaid.

Executed at Harrisburg, Pennsylvania, this 11th day of April, 1996.

Maureen A. Scott

Counsel for the Pennsylvania Public Utility Commission

Attachment: Service List

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The Honorable Susan Ness, Commissioner Federal Communications Commission 1919 M Street, N.W. -- Room 832 Washington, D.C. 20554

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